

STATEMENT PROVIDED REGARDING JOHN PAVLICA'S MOTION TO DISMISS IBOC
MM DOCKET NUMBER 99-325:

I feel that the I-BOC HD Radio system, as implemented on the AM broadcast band, needs further study and consideration prior to approval for night time operation, and nationwide commercial rollout to AM stations.

One aspect of the system is the continuous occupied bandwidth up to +15kHz and -15kHz from AM station center carrier frequency. This is not on same footing with U.S.A analog AM stations, that must meet NRSC-2 occupied bandwidth to +10.2kHz and -10.2kHz from center frequency. In addition, it was not adequately proved in iBiquity studies how representative large samples of consumer AM radio receivers would react to such wide occupied bandwidth. For instance, I discovered during recent HD Radio testing that my Delphi GM analog tuner's seek and scan tuning functions were rendered inoperable. When I activated this feature, my digitally synthesized tuner would seek and scan to the first adjacent frequencies found on either side of the HD Radio test station, as though my tuner found a legitimate station. In actuality, I was treated with a very loud hissing sound from my speakers.

HD Radio field tests in late 2002 with WLW-AM and WOR-AM had indicated that AM stations transmitting HD Radio decreased signal-to-noise ratio for their own stations, as well as for first and second adjacent AM stations. Is this progress?

In conclusion, iBiquity needs to conduct further field and laboratory testing of their HD Radio system, for not less than one year period. During this testing period, HD Radio effects should be evaluated on very large sampling of AM receivers. This final report should be presented to the FCC for further evaluation.

Extensive night time testing should take place, as well, using wideband and legacy audio AM receivers and tuners in the study, with goal to further reduce or to eliminate interference caused to first and second adjacent AM stations by the HD Radio system.

Sincerely,
Jeff Deck
Concerned citizen from Novi, Michigan